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11 Attorneys for Defendants Juniper Networks, Inc.,
12 Scott Kriens, Pradeep Sindhu, Marcel Gani,
13 Robert M. Calderoni, Kenneth Goldman, William
14 R. Hearst III, Stratton Sclavos, Vinod Khosla,
15 Kenneth Levy and William R. Stensrud

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN JOSE DIVISION

19 In re JUNIPER NETWORKS, INC.) No. C06-04327-JW
20 SECURITIES LITIGATION)
21 _____) STIPULATION AND [PROPOSED] ORDER
22 This Document Relates To:) REGARDING FILING OF
23 ALL ACTIONS.) CONSOLIDATED BRIEFS REGARDING
24) MOTIONS TO DISMISS
25 _____)
26
27
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1 This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
2 Funds, and defendants Juniper Networks, Inc., Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert
3 M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth
4 Levy and William R. Stensrud (the "Juniper Defendants"), by and through their respective attorneys
5 of record.

6 WHEREAS, Defendants Scott Kriens, Pradeep Sindhu and Marcel Gani (the "Officer
7 Defendants") intend to file a motion to dismiss the claims against them, and all of the Juniper
8 Defendants collectively also intend to file a separate motion to dismiss;

9 WHEREAS, it would likely be more convenient for the Court and for opposing counsel if the
10 Officer Defendants and the Juniper Defendants combine their motions to dismiss into a single
11 motion to dismiss with a slightly longer page limit than that provided by the Local Rule 7-4(b); and

12 WHEREAS, the parties intend to meet and confer in good faith in the event that (a) Lead
13 Plaintiff determines to file a single consolidated opposition to the Juniper Defendants' combined
14 motion with a slightly longer page limit, and/or (b) the Juniper Defendants determine to file a single
15 consolidated reply with a slightly longer page limit;

16 NOW, THEREFORE, the parties hereby stipulate, and request the court to order, as follows:

17 1. All the Juniper Defendants shall file and serve a single consolidated motion to
18 dismiss not to exceed thirty-five (35) pages.

19 IT IS SO STIPULATED.

20 DATED: June 6, 2007

WILSON SONSINI GOODRICH & ROSATI, P.C.
NINA F. LOCKER
STEVEN GUGGENHEIM
JONI OSTLER

21 _____
22 /s/ Joni Ostler
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28 Attorneys for Defendants Juniper Networks, Inc.,
29 Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert
30 M. Calderoni, Kenneth Goldman, William R. Hearst
31 III, Stratton Sclavos, Vinod Khosla, Kenneth Levy
32 and William R. Stensrud

1 *I, Joni Ostler, am the ECF user whose ID and password are being used to file this*
2 *Stipulation and [Proposed] Order Regarding Filing of Amended Complaint and Briefing*
3 *Schedule. In compliance with General Order 45, X.B., I hereby attest that David C. Harrison*
4 *has concurred in this filing.*

5 DATED June 6, 2007

6 NEIL L. SELINGER
7 RICHARD BEMPORAD
8 DAVID C. HARRISON
9 LOWEY DANNENBERG BEMPORAD
10 SELINGER & COHEN, P.C.

11 _____
12 /s/ David C. Harrison
13 DAVID C. HARRISON

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18 *Lead Counsel for Lead Plaintiff*

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24 *Local Counsel for Lead Plaintiff*

25 * * *

26 **ORDER**

27 PURSUANT TO STIPULATION, IT IS SO ORDERED.

28 DATED: June 8 2007

29 _____
30 THE HONORABLE JAMES WARE
31 UNITED STATES DISTRICT JUDGE

